

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DR. KAROLINA MARCINIAK-DOMINGUES
GONCALVES AGRA and MR. PEDRO
MARCINIAK-DOMINGUES GONCALVES AGRA,

Plaintiffs,

v.

MASSACHUSETTS INSTITUTE OF
TECHNOLOGY, *et al.*,

Defendants.

)
)
)
)
) Case No. 1:23-cv-10305-JPC
)
)

ORAL ARGUMENT REQUESTED

**NOTICE OF MASSACHUSETTS INSTITUTE OF TECHNOLOGY’S
MOTION TO DISMISS THE COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 8 and 12, Defendant Massachusetts Institute of Technology (“MIT”) moves to dismiss the Complaint (Dkt. 1, the “Complaint”) in its entirety and with prejudice. As grounds for this Motion, MIT states as follows:

The Complaint should be dismissed for the reasons stated in the Memorandum of Law in Support of MIT’s Motion to Dismiss the Complaint, and the Declaration of Glen Shor in Support of MIT’s Motion to Dismiss the Complaint.

WHEREFORE, MIT respectfully requests that this Court issue an Order dismissing the Complaint in its entirety and with prejudice, and granting such other and further relief as the Court deems just and proper.

Dated: January 29, 2024

Respectfully submitted,

MASSACHUSETTS INSTITUTE OF
TECHNOLOGY

By their attorneys,

/s/ Jennifer L. Chunias

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CERTIFICATE OF SERVICE

I, Jennifer L. Chunias, hereby certify that a copy of the foregoing Notice of Massachusetts Institute of Technology's Motion to Dismiss the Complaint, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on January 29, 2024.

Dated: January 29, 2024

/s/ Jennifer L. Chunias